

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA

18 U.S.C. § 1349

v.

Case: 2:21-cr-20428

Assigned To : Parker, Linda V.

Referral Judge: Stafford, Elizabeth A.

Assign. Date : 6/24/2021

Description: INFO USA v. POYNTER SO)

D-1 SERENITY POYNTER,

Defendant.

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INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT 1

Conspiracy to Commit Wire Fraud

18 U.S.C. §§ 1343, 1349

1. Beginning in approximately May 2020 and continuing through approximately July 2020, in the Eastern District of Michigan, defendant Serenity Poynter knowingly and intentionally conspired and agreed with other individuals, both known and unknown to the government, to devise and execute a scheme and artifice to obtain money and property by means of false or fraudulent pretenses, representations, and promises, and for the purposes of executing the scheme and artifice, transmitted and caused to be transmitted by means of wire

communication in interstate commerce writings, signs, signals, pictures, and sounds.

The Scheme to Defraud

2. As part of the scheme to defraud, members of the conspiracy submitted numerous false and fraudulent claims to the Michigan Unemployment Insurance Agency, seeking unemployment benefits to which they were not entitled. They were assisted by an employee of the Michigan Unemployment Insurance Agency, who was a member of the conspiracy and with whom the conspirators shared the proceeds of their scheme.

Object of the Conspiracy

3. The object of the conspiracy was to obtain money from the Michigan Unemployment Insurance Agency by filing false and fraudulent claims seeking unemployment benefits to which the conspirators were not entitled.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that members of the conspiracy, including POYNTER, were acquainted with an individual who worked as a claims examiner at the Michigan Unemployment Insurance Agency.
5. It was part of the conspiracy that members of the conspiracy, including POYNTER, agreed to work with the employee of the Michigan Unemployment Insurance Agency to defraud the Michigan Unemployment Insurance Agency

by obtaining unemployment benefits to which they were not entitled. Members like POYNTER agreed to electronically file false and fraudulent claims, while the employee of the Michigan Unemployment Insurance Agency agreed to use his access to the computer system at the Unemployment Insurance Agency to override fraud holds and ensure the claims were approved for payment.

6. It was part of the conspiracy that members of the conspiracy, including POYNTER, received unemployment benefits on debit cards issued by Bank of America. Members like POYNTER often withdrew money from these cards, which triggered interstate wire communications, as Bank of America's servers are located outside of the state of Michigan.
7. It was part of the conspiracy that members of the conspiracy, including POYNTER, agreed to divide the proceeds of the scheme with the employee of the Michigan Unemployment Insurance Agency, often by withdrawing money received on Bank of America debit cards and providing cash to him

SAIMA S. MOHSIN
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